Jeffrey R. Fine State Bar No. 07008410 James H. Billingsley State Bar No. 00787084 Daniel I. Morenoff State Bar No. 24032760 K&L Gates LLP Suite 2800 1717 Main Street Dallas, Texas 75201

Telephone: (214) 939-5567 Facsimile: (214) 939-5849

PROPOSED ATTORNEYS FOR THE OFFICIAL UNSECURED CREDITOR COMMITTEE

## IN THE UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF TEXAS FORT WORTH DIVISION

In re:	§	
	§	Chapter 11
TEXAS RANGERS	§	
BASEBALL PARTNERS,	§	Case No. 10-43400-dml-11
	§	
Debtor.	§	

## NOTICE OF APPEARANCE, REQUEST FOR ALL NOTICES, AND DEMAND FOR SERVICE OF ALL PLEADINGS AND FILINGS

PLEASE TAKE NOTICE that the undersigned hereby enters an appearance on behalf of the Official Unsecured Creditor Committee ("UCC"), a party-in-interest in the above-styled and numbered Chapter 11 bankruptcy case, as proposed attorneys for such party, and hereby requests notice of all hearings and conferences in such case and makes demand for service of all pleadings, filings, notices, and other actions and papers pursuant to 11 U.S.C. §1109(b) and Bankruptcy Rule 9010(b) and request copies of all notices and pleadings pursuant to Bankruptcy Rules 2002(a), (b) and (f) and 3017(a), including, without limitation, all proposed disclosure statements and plans of reorganization. All such notices should be addressed as follows:

Jeffrey R. Fine
James H. Billingsley
Daniel I. Morenoff
K&L Gates LLP
1717 Main Street, Suite 2800
Dallas, TX 75201
(214) 939-5567
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PLEASE TAKE FURTHER NOTICE that the foregoing request and demand includes not only the notices, pleadings, filings, and papers referred to in the above-referenced Bankruptcy Rules and sections of the United States Bankruptcy Code, but also includes, without limitation, the Debtors' schedules and statement of financial affairs and all amendments or supplements thereto, and any and all operating reports, disclosure statements, reorganization plans, letters, correspondence, applications, motions, complaints, objections, claims, demands, hearings, or requests, whether formal or informal, whether oral or in writing, which may be filed, submitted, transmitted, or conveyed to the Bankruptcy Clerk, Bankruptcy Court, or Bankruptcy Judge (as such terms are used and defined in Bankruptcy Rule 9001) in connection with this bankruptcy case and any proceedings related thereto or arising therein.

PLEASE TAKE FURTHER NOTICE that neither this notice nor any later appearance, pleading, claim, or suit shall waive any right (1) to have final orders in non-core matters entered only after de novo review by a District Judge, (2) to trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case, or (3) to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal.

PLEASE TAKE FURTHER NOTICE that this Notice of Appearance is without

prejudice to: (1) the UCC's rights, remedies, claims, actions, defenses, in law or in equity,

against the Debtor and any other entities either in this case or in any other action, all of which

rights, remedies, claims, actions, defenses, are expressly reserved, and (2) any objection which

may be made to the jurisdiction of the Court, and shall not be deemed or construed to submit the

UCC to the jurisdiction of the Court.

The undersigned additionally requests that the Debtor and the Clerk of the Court place

the foregoing names and addresses, including electronic mail addresses, on any mailing matrix or

list of creditors to be prepared or existing in the above-numbered cause.

DATE: June 9, 2010

Respectfully submitted,

By: /s/ Jeffrey R. Fine

Jeffrey R. Fine

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## **CERTIFICATE OF SERVICE**

This is to certify that this Notice of Appearance and Request for Service of N	otices and Papers
has been served upon the CM/ECF parties on this 9 <sup>th</sup> day of June, 2010.	
/o/ Loffroy D. Fina	
/s/ Jeffrey R. Fine	